IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

LASHAWN EZELL	D1~:+:-££)	Case No. 18 CV 01049
	Plaintiff,)	Judge Sara L. Ellis
v.)	6
)	
CITY OF CHICAGO, et al.,)	
	Defendants.)	
LAROD STYLES)	Case No. 18 CV 01053
	Plaintiff,)	
v.)	Consolidated with Ezell v. City
CITY OF CUICAGO et al)	18 CV 1049
CITY OF CHICAGO, et al.,	Defendants.)	10 C V 1049
CHARLES JOHNSON)	Case No. 18 CV 01062
	Plaintiff,)	
v.)	Consolidated with Ezell v. City
CITY OF CHICAGO, et al.,)	18 CV 1049
CITT OF CITICAGO, et al.,	Defendants.)	10 C V 1049
TROSHAWN MCCOY,	Defendants.)	Case No. 18 CV 01068
1110 2111 1 1 1 1 1 0 0 0 1 1	Plaintiff,)	0300 1 (07 10 0 7 0 10 00
v.)	Consolidated with Ezell v. City
)	
CITY OF CHICAGO, et al.,	D 0 1)	18 CV 1049
	Defendants.)	

JOINT MOTION TO STAY PRETRIAL BRIEFING AND DEADLINES

Counsel for Plaintiffs and counsel for Defendants City of Chicago and the individual Defendant Officers (hereinafter, "Parties") hereby jointly move to stay all pretrial briefing and deadlines as to Plaintiffs' claims against the City Defendants. In support, they state:

1. This case is set for trial on May 14, 2024. ECF No. 558. On March 8, this Court held a mediation conference with the Parties. ECF No. 550.

2. Since then, the Parties have been working diligently to comply with the Court's pretrial deadlines, including preparing the pretrial order. That process has consumed and is consuming very substantial amounts of attorney time as lawyers on both sides of this case put in

16-hour days to complete the Final Pretrial Order.

3. After the mediation, the City Defendants and Plaintiffs also continued discussions

regarding settlement that had commenced with the Court's involvement. Those discussions have

resulted in substantial progress. The Parties believe they are very close to achieving an agreed

resolution. They will know within several days whether they can conclude an agreement.

4. Given the status of settlement negotiations and the very substantial costs associated

with continuing the preparation of the Pretrial Order, the Parties jointly move to stay the remaining

pretrial deadlines in this case, including the pretrial order submission due today, ECF No. 534, in

anticipation of a final settlement of the case.

WHEREFORE, the Parties jointly request that this Court stay further deadlines as to the

trial of this case.

Respectfully submitted,

/s/ Alexa Van Brunt

Alexa Van Brunt

Noor Tarabishy

MACARTHUR JUSTICE CENTER

375 East Chicago Avenue

Chicago, Illinois 60611

(312) 503-1336

a-vanbrunt@law.northwestern.edu

Counsel for Plaintiff Charles Johnson

/s/ Jon Neuleib

Jon Neuleib

Michael Oppenheimer

ERICKSON & OPPENHEIMER, LTD

223 W. Jackson Blvd, Suite 200

Chicago, Illinois 60606

(312) 327-3370

Jonn@eolawus.com

Counsel for Plaintiff Troshawn McCoy

/s/Terrence H. Campbell

Terence H. Campbell
COTSIRILOS, TIGHE, STREIKER, POULOS &
CAMPBELL, LTD
55 E. Monroe, Suite 3250
Chicago, Illinois 60603
(312) 263-0345
Tcampbell@cotsiriloslaw.com
Counsel for Plaintiff Larod Styles

/s/ Lisa M. Meador

Special Assistant Corporation Counsel
THE SOTOS LAW FIRM, P.C.
141 W. Jackson Blvd., #1240A
Chicago, IL 60604
(630) 735-3300
lmeador@jsotoslaw.com
Counsel for the Defendant City of Chicago

March 22, 2024

Locke E. Bowman
Jon Loevy
Lauren Carbajal
LOEVY & LOEVY
311 North Aberdeen St., 3rd Floor
Chicago, Illinois 60607

(312) 243-5900 locke@loevy.com Counsel for Plaintiff LaShawn Ezell

/s/ Stacy A. Benjamin

/s/ Locke E. Bowman

Special Assistant Corporation Counsel ROCK FUSCO & CONNELLY, LLC 333 West Wacker, Suite 1900 Chicago, Illinois 60606 (312) 494-1000 Sbenjamin@rfclaw.com

Counsel for Individual Defendant

Officers